

201-15882

# Petroleum HPV

May 4, 2005

Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attention: Chemical Right-to-Know Program

**HPV Challenge Program, AR-201**  
**HPV Consortium #**

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**Re: Phenols Category in Reclaimed Substances Test Plan**  
**Category transfer (1 CASRN) and Withdrawal of Sponsorship (1 CASRN)**

Dear Administrator:

The Petroleum HPV Testing Group is a consortium representing 92 percent of the nation's petroleum refining capacity. The Group is made up of 60 member companies of the American Petroleum Institute (API), the National Petrochemical & Refiners Association (NPRA), the Gas Producers Association (GPA) and the Asphalt Institute. In its test plan for Reclaimed Substances, which was posted to the Agency's ChemRTK website on January 2004, the Testing Group addressed four separate categories of chemical substances: naphthenic acids, phenolics, disulfides, and acids/caustics. In the Agency's comments on the test plan (dated September 2, 2004), it indicated that it would "address the phenolics and disulfides issue in separate correspondence as is normally done for no-longer-HPV requests".

This letter addresses two substances in the "phenolics" category:

**CASRN 64743-03-9**

Phenols, (petroleum) or Crude phenolic compounds (petroleum)

"A complex combination of organic compounds, predominantly phenol, cresols, xylenols and other alkylated phenols obtained primarily from cracked naphtha or distillate streams by alkaline extraction"

The API Petroleum HPV Testing Group is **withdrawing sponsorship of CASRN 64743-03-9**.

This CASRN is no longer manufactured by any testing group member. Additionally, we are aware from phone conversations with EPA that this substance was not reported on either the 1998 or 2002 TSCA Inventory Update reports, and therefore believe it to be eligible for "no longer HPV" status.

**CASRN 68988-99-8**

Phenols, sodium salts, mixed with sulphur comp; gasoline alky scrubber residues  
A complex combination of phenolic compounds and sulfur compounds obtained from the treatment of gasoline with aqueous alkali at the catalytic cracking unit. It consists primarily of sodium salts of phenols, water neutral oils and sulfur compounds.

This second substance that was included in the "phenolics" category in the original test plan has been transferred to the acids/caustics category, and will be addressed in a separate technical letter to the Agency.

As a result of these actions, there is no longer a "phenolics" subcategory/category associated with Reclaimed Substances.

If you have further questions about these substances, please don't hesitate to contact me at (202) 682-8344.

Sincerely,

Lorraine Twerdok, Ph.D., DABT  
Manager, Health Sciences and  
Petroleum HPV Testing Group Program Manager

Cc: O. Hernandez, EPA  
M. Townsend, EPA  
Petroleum HPV Testing Group Oversight Committee  
Petroleum HPV Testing Group Technical Committee